

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	Hon. John J. Tharp Jr.
Cook County Sheriff Thomas Dart, et al.)	
)	
Defendants.)	
)	

**DEFENDANTS' THIRD AGREED
MOTION FOR EXTENSION OF TIME FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Third Agreed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. Counsels for all parties have been in communication regarding this Motion and are in agreement as to the requested extension.
2. This is the Third requested extension to the dispositive motion deadlines in this matter.
3. The parties filed a first Agreed Motion for Extension of Time for Briefing of Dispositive Motions with this Court on October 9, 2024. (ECF No. 93.)
4. Thereafter, on October 10, 2024, this Court granted such extension, ordering Dispositive Motions due by December 2, 2024, Responses due by January 10, 2025, and Replies due by January 23, 2024. (ECF No. 94.)
5. The Parties' Second Agreed Motion for Extension of Time for Briefing of Dispositive Motions was then filed with this Court on November 6, 2024. (ECF No. 95.)

6. Thereafter, on November 7, 2024, this Court granted such extension, ordering Dispositive Motions due by January 15, 2025, Responses due by February 24, 2025, and Replies due by March 10, 2025. (ECF No. 96.)
7. Both Plaintiff and Defendants remain in agreement they still need additional time to draft any dispositive motions. Briefing summary judgment prior to a decision on the pending motion for class certification may present “a formula for one-way intervention.” *See Bennett v. Dart*, 953 F.3d 467, 469 (7th Cir. 2020).
8. Accordingly, the parties now request extensions to all deadlines, up to and including the following dates: Dispositive Motions due by February 14, 2025; Responses due by March 26, 2025; and Replies due by April 21, 2025.
9. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
10. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
11. The extension will grant the parties sufficient time to prepare their briefs, as well as allow the Court more time to potentially rule on the aforementioned pending Motions, the results of which could strongly impact both parties’ arguments at this dispositive stage.
12. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. The Agreed Motion for Extension of Time is granted;
2. Dispositive Motions are due by February 14, 2025; Responses are due by March 26, 2025; and Replies are due by April 21, 2025; and

3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

Defendants

By: /s/ Zachary G. Stillman
Zachary G. Stillman, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

Jason E. DeVore (ARDC # 6242782)
Troy S. Radunsky (ARDC # 6269281)
Zachary G. Stillman (ARDC # 6342749)
230 W. Monroe Street, Ste. 230
Chicago, IL 60606
(312) 300-4479 telephone
jdevore@devoreradunsky.com
tradunsky@devoreradunsky.com
zstillman@devoreradunsky.com

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that the above **Third Agreed Motion for Extension of Time** was filed on December 23, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman